Recommended Practice for a Continuity of Operations Plan

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Abstract: This Recommended Practice covers the creation and implementation of the Continuity of Operations Plan.

Keywords: Essential Functions, Plan, Operations

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Introduction

(This introduction is not a part of APTA RP-SEM-001-08, Recommended Practice for Continuity of Operations Plan.)

This Recommended Practice for Continuity of Operations Plan represents a common viewpoint of those parties concerned with its provisions, namely transit operating/planning agencies (transit systems), manufacturers, consultants, engineers and general interest groups. The application of any standards, practices or guidelines contained herein is voluntary. In some cases, federal and/or state regulations govern portions of transit systems' operations. In those cases, the government regulations take precedence over this Recommended Practice. APTA recognizes that for certain applications, the practices implemented by transit systems may be either more or less restrictive than those given in this document.

The purpose of an APTA Transit Recommended Practice is to ensure that each transit system achieves a high level of safety for passengers, employees and the public.

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Recommended Practice for a Continuity of Operations Plan

1. Overview

A Continuity of Operations Plan (COOP) provides a transit agency with a plan to facilitate quick restoration of essential functions after an emergency.

1.1 Scope

The scope of this recommended practice is to provide a Transit Agency with an outline of the basic elements needed to develop a Continuity of Operations Plan (COOP). Each element that should be included in a COOP will be described in a simple and concise format.

This recommended practice was developed with reference to methodologies included in the Transportation Research Board's TCRP Report #86, Volume 8 "Continuity of Operations (COOP) Planning Guidelines for Transportation Agencies"

1.2 Purpose

The purpose of a COOP is to prepare a transit agency so that it can provide essential agency functions following a significant emergency event that limits or restricts the availability of personnel, facilities, or technical systems. The COOP is a specific component of a transit agency's overall Emergency Operations Plan (EOP). While the EOP is an organized approach to emergency management including a concept of operations during, pre, trans, and post emergency situations, the COOP is very specific to the recovery and restoration aspects of emergency management. The COOP focuses on restoring limited operating capability, usually within a 12 hour time frame and for a period of up to 30 days. Beyond 30 days, it is assumed that an agency will have reestablished a degree of normality.

The COOP also differs from a Business Recovery Plan. A Business Recovery Plan is generally developed by a private company with the primary purpose of preventing the business from floundering, while COOP plans are focused on providing essential public services.

2. References

- 1. The Transportation Research Board *Continuity of Operations (COOP) Planning Guidelines for Transportation Agencies* (NCHRP Report 525), and other resources at: http://www.trb.org/news/blurb_detail.asp?id=5612
- 2. The Federal Emergency Management Agency (FEMA) provides:
 - a. COOP development, worksheets, examples and training guidance at: http://www.fema.gov/government/coop/index.shtm
 - b. A template for a COOP at: http://www.fema.gov/government/coop/coop plan blank template.doc
 - c. Federal Preparedness Circular No. 65 (June 15, 2004) at: http://www.fema.gov/government/coop/fpc65 0604.txt

3. Definitions, abbreviations and acronyms

3.1 Definitions

- **3.1.1 Essential Functions**: activities or tasks that an agency must perform in a safe manner, following an emergency event that limits or restricts an agency's employees or physical resources, in order to provide limited vital services needed to sustain the industrial/economic base of the area.
- **3.1.2 Business Recovery Plan:** This term is generally used in describing COOP activities related to a private business or organization. In short, Business recovery and restoration, or business resumption, goes right to a facility's bottom line: keeping people employed and the business running.
- **3.1.3 Emergency Operation Plans (EOP):** Emergency Operation Plans should be written to include the incident command system and be NIMS compliant, Should be review annually. EOP's should be written in an All Hazards approach as to plan for a wide variety of disasters. Emergency operation plan replaces the term "disaster plan". EOP is not the entire plan but rather the method by which the transit agency will function when an emergency is declared.

3.2 Abbreviations and acronyms

COOP Continuity of Operations PlanFEMA Federal Emergency Management AgencyTA transit agency

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4. Approval of the COOP

The CEO or other Executive Management of the TA should define the process for approval of the initial COOP, periodic reviews of the COOP, and revisions to the COOP. Persons with the authority to revise the COOP should be clearly identified. The COOP should be a living document that is updated as lessons are learned and new information is gained.

This process should be defined within the COOP itself, within the EOP, or other pertinent TA administrative documentation.

5. Identification of essential functions

The COOP should list essential functions and the resources needed to perform them. Essential functions are those functions that enable the agency to provide vital services needed to sustain the industrial/economic base of the area, while maintaining the safety and well-being of the agency's employees and the general population.

In determining the essential functions, an agency might start by listing its basic functions, and then analytically separating the essential functions from the non-essential functions. Examples of essential functions for a transit agency include fuel/power delivery, providing adequate vehicle and wayside maintenance, providing necessary communications, providing for employee needs, providing public information, and maintaining safety and security.

6. Implementation of essential functions

For each identified essential function, the TA should describe the actions that need to be taken and the tasks that need to be performed. This could take the form of specific procedures, checklists, task lists or a combination of all three. In some cases specific procedures could be helpful in implementing an essential function. In other cases, specific procedures may be impractical, and a list of tasks along with reliance on individual ingenuity may be the best approach.

Successful implementation of essential functions is also dependent upon the availability of pertinent resources. Sections 6.1 through 6.5 describe resources that should be given specific consideration and addressed within the COOP. In addition to resources required to implement essential functions, resources needed to sustain personnel in the fulfillment of their responsibilities should be considered.

6.1 Alternative operating facilities

The TA should identify alternative operating facilities for the performance of its essential functions for those locations that could be severely impacted by a plausible all-hazards

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emergency, and plan for these to be available when needed. Alternative operating facilities should provide sufficient space for needed equipment and for personnel to work in a healthy, safe and secure environment. Additionally, alternative facilities should be located so that essential services can be restored within 12 hours and sustained for a period of up to 30 days.

As a practical matter, an agency should explore utilizing existing facilities under its control to serve as alternative facilities to the degree possible. This might entail some expenditure in equipping facilities for dual use (i.e. facility normal function as well as alternative emergency function), as this is more viable than maintaining facilities that are only utilized in times of disaster response. Each agency will need to determine specific alternative operating facilities based on their analysis of essential functions.

6.2 Interoperable communication system

The TA should identify the communication systems that will be needed to support each essential function, and plan for these to be available when needed. Consideration should be given to the various links that need to be established. These links might include communications with internal departments, field personnel, outside agencies, law enforcement, and the public. Based on response needs, transit agencies may need to acquire and allocate mobile communications equipment such as mobile phones and laptops. Additionally, in cases where an alternative operating facility may be needed, the COOP should address how interoperable communications will be made available at the alternative facility.

6.3 Employees/human capital

The TA should identify the staffing needs to establish and maintain each essential function, and plan for these to be available when needed. As each essential function is evaluated with regard to human capital, the following elements should be considered:

- Which employees will be needed to perform the function
- What preparatory training needs to be provided to employees who will be called upon to fulfill non-routine tasks (See Section 9 for additional information)
- How will the employees be notified (See Section 8)
- Where will they be located and how will they communicate (See Sections 6.1 and 6.2), and
- Will they require provisions such as transportation, food, and lodging (See Section 6.5)

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6.4 Vital records, databases and systems

The TA should identify the vital records, databases and hard copy documents needed to support the essential functions, along with the appropriate equipment to access the electronic files, and plan for these to be available when needed. In addition to immediate operational needs, legal and financial obligations should also be considered. Appropriate processing and backup of vital records and documents should be maintained to meet the needs of the agency during and beyond the disaster recovery phase. Depending on the nature of the emergency a transit agency's accounting department may need to accurately maintain financial records to acquire emergency specific funding.

In cases when an alternative operating facility may be needed to sustain the essential function, the COOP should address how the necessary equipment, systems and records will be made available at the alternative location.

6.5 Additional resource requirements

The TA should identify critical physical resources required, beyond those specifically covered above, to sustain each critical function, and plan for these to be available when needed. Fuel, electrical power, parts, material, equipment, and other similar items should be considered. In addition, extraordinary provisions may be necessary to support critical employees, including transportation, food and lodging. When appropriate, transit agencies should integrate their plans with local and regional transportation agencies or departments to allow them to provide and share resources during an emergency.

7. Delegation of authority and order of succession

The COOP should address pre-delegated authority for making policy determinations at the headquarters and field levels to ensure adequate oversight and coordination of the essential functions.

Additionally, the COOP should identify critical senior managers and critical technical experts needed to implement and sustain each essential function. For each of these individuals, the TA should identify one or more alternative(s) that will be authorized to assume the post, if the primary individual is unavailable, along with any rules governing the limitations and conditions of the authorization.

8. Notification and contact lists

The TA should develop a notification procedure and maintain contact lists and notification call down rosters necessary to implement and sustain the essential functions.

This might take the form of a cascading structure. The contact information for executive managers and individuals with primary responsibilities for implementing tasks within

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each essential function (along with appropriate alternatives) might be listed first, along with a notification procedure to ensure a chain of command structure is implemented early in the process. Each task leader, such as a department manager would then implement their department specific notification procedure to acquire the necessary personnel.

9. Training and exercises

The TA should provide appropriate training for individuals that may need to fill non-routing roles and/or assuming non-conventional responsibilities within the COOP.

Additionally, exercises or drills should be conducted periodically to test the plan and identify any problem areas. In practice, efficiencies might be gained by conducting these exercises in conjunction with (or annexed to) other emergency response exercises required from time to time. COOP drills and exercises may involve activation of alternative operating facilities and accessing remote networks.

10. Reconstitution

The TA should consider what procedures, if any, are needed to resume normal operations. Considerations should be given to how the agency will inform employees that the COOP is no longer in effect, and what instructions will need to be provided for resumption of normal services.